

STATE OF CALIFORNIA  
STATE AND CONSUMER SERVICES AGENCY  
CALIFORNIA BUILDING STANDARDS COMMISSION  
2525 NATOMAS PARK DR., SUITE 130  
SACRAMENTO, CA 95833  
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Email: cbsc@dgs.ca.gov

BSC 07/12 P711  
Office Use Item No. HCD 04/12

**PARTICIPATION COMMENTS FOR THE NOTICE DATED AUGUST 31, 2012**  
Written comments are to be sent to the above address.

**WRITTEN COMMENT DEADLINE: OCTOBER 15, 2012**

Date: October 15, 2012

From: Wes Sullens

\_\_\_\_\_  
Name (Print or type)



**StopWaste.Org** – the Alameda County Waste Management Authority and Source Reduction and Recycling Board  
Agency, jurisdiction, chapter, company, association, individual, etc.

1537 Webster Street, Oakland, CA 94612

Street

City

State

Zip

I/We do not agree with:

☒ The Agency proposed modifications As Submitted on Section No. **4.106 and 5.106**

and request that this section or reference provision be recommended:

☐ Approved ☐ Disapproved ☒ Held for Further Study ☐ Approved as Amended

**Suggested Revisions to the Text of the Regulations:**

While we support our proposed and amended revision to Section A4.106.3, we also recommend that this section be moved to the mandatory portion of the code with the creation of additional measures under new sections, such as sections 4.106 and 5.106.

Proposed Language:

*4.106.4 & 5.106.4: Invasive plant species as shall not be planted on a building site. Construction documents shall include a plant list indicating botanical name and common name and shall be approved by the landscape architect or architect of record.*

**DEFINITIONS**

*Cal-IPC. The California Invasive Plant Council is a nonprofit organization that defines criteria for invasive plant species and maintains the Invasive Plant Inventory Database in California.*

*INVASIVE PLANT SPECIES. Species that are not historically found in California that spread outside cultivated*

*areas and can damage environmental or economic resources. Invasive species shall include those plants listed on approved city, county or regional lists. In the absence of an approved list, invasive species shall include those plants on the Cal-IPC Invasive Plant Inventory Database classified as invasive within the region of the project.*

**Reason:** [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
- (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
- (3) The public interest requires the adoption of the building standards.
- (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
- (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
- (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
- (8) The format of the proposed building standards is consistent with that adopted by the commission.

***Please see attached letter.***